

1 JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney

2 BRIAN J. STRETCH (CABN 163973)  
3 Chief, Criminal Division

4 CYNTHIA M. FREY (CABN 150571)  
5 Assistant United States Attorney  
6 450 Golden Gate Avenue, Box 36055  
7 San Francisco, California 94102  
Telephone: (415) 436-7200  
Facsimile: (415) 436-7234  
E-Mail: Cynthia.Frey@usdoj.gov

8 Attorneys for the United States of America

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, ) No. CR 10-0071 MHP  
14 Plaintiff, ) STIPULATION AND [PROPOSED]  
15 v. ) ORDER EXCLUDING TIME BETWEEN  
16 JOSE JUAN CASTELLANOS-FLORES, ) FEBRUARY 22, 2010 AND MARCH 15,  
a/k/a RAMON FLORES ORTIZ, ) 2010 FROM CALCULATIONS UNDER  
a/k/a JOSE FLORES, ) THE SPEEDY TRIAL ACT (18 U.S.C. §  
a/k/a FLORES RIVERO, ) 3161)  
a/k/a JOSE CASTELLANO, )  
a/k/a/ SALVADOR FLORES GONZALEZ, )  
19 )  
20 Defendant. )  
21 \_\_\_\_\_

22 The defendant, Jose Juan Castellanos-Flores, represented by Rita Bosworth, Assistant  
23 Federal Public Defender, and the government, represented by Brian Lewis for Cynthia M. Frey,  
24 Assistant United States Attorney, appeared before this Court on February 22, 2010, for a status  
25 conference. At the hearing, this Court set the matter over for a further status conference on  
26 March 15, 2010.

27  
28 STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME  
CR 10-0071 MHP

1 The parties agreed that time be excluded under the Speedy Trial Act between February 22,  
2 2010 and March 15, 2010 for purposes of effective preparation of counsel, in order to provide  
3 defense counsel with adequate time to review discovery and consult with the defendant.

4 In addition, the defendant agrees to exclude for this period of time any time limits  
5 applicable under 18 U.S.C. § 3161. The parties represent that granting the continuance, in order  
6 to provide defense counsel with adequate time to review the discovery and consult with the  
7 defendant, is necessary for effective preparation, taking into account the exercise of due  
8 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served  
9 by granting such a continuance outweigh the best interests of the public and the defendant in a  
10 speedy trial. 18 U.S.C. § 3161(h)(7)(A).

11  
12 SO STIPULATED:

**JOSEPH P. RUSSONIELLO  
United States Attorney**

**15** | DATED: March 3, 2010

/s/

**18** | DATED: March 3, 2010

/s/  
RITA BOSWORTH  
Attorney for JOSE JUAN CASTELLANOS-FLORES

1       Based upon the representation of counsel and for good cause shown, the Court finds that  
2 failing to exclude the time between February 22, 2010 and March 15, 2010 would unreasonably  
3 deny counsel the reasonable time necessary for effective preparation, taking into account the  
4 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of  
5 justice served by excluding the time between February 22, 2010 and March 15, 2010 from  
6 computation under the Speedy Trial Act outweigh the best interests of the public and the  
7 defendant in a speedy trial.

8       Therefore, IT IS HEREBY ORDERED that the time between February 22, 2010 and  
9 March 15, 2010 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.     §  
10 3161(h)(7)(A) and (B)(iv).

11      DATED: 3/4/2010

